

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**LAURA JOHNSON-PRICE,**

*Plaintiff,*

**v.**

**DEPARTMENT OF  
HUMAN RESOURCES, et al.,**

*Defendants.*

**CIVIL ACTION NO.:  
2:07-CV-568-MHT**

**DEFENDANTS' MOTION FOR A TEN DAY EXTENSION OF TIME TO  
ANSWER PLAINTIFF'S AMENDED COMPLAINT**

COME NOW, Defendants in the above-style matter, and respectfully request this Court grant a ten (10) day extension of time for Defendants to answer Plaintiff's Amended Complaint. In support of this Motion, Defendants state the following:

1. On August 30, 2007, this Court entered an Order requiring Plaintiff to respond to Defendants' recently filed Motion to Dismiss on or before November 2, 2007. On October 31, 2007, Plaintiff filed a Motion for an Extension of time in which to respond to Defendants' motion. On November 2, 2007, the Court granted Plaintiff's motion for a ten (10) day extension. Plaintiff then filed her Amended

Complaint on November 13, 2007.<sup>1</sup> On November 16, 2007, the Court entered an Order allowing Defendants until November 27, 2007, to answer Plaintiff's Amended Complaint.

2. As a result of Plaintiff's ten day extension, the time for Defendants to answer Plaintiff's Amended Complaint in this and one other DHR case is just after the Thanksgiving holidays. In addition, the Amended Complaint has numerous factually specific allegations, which will require an extensive amount of time in which to respond. Defendants simply request an extension of time equal to the time of Plaintiff's previously granted extension.

3. Defendants have contacted Plaintiff's counsel and he does not oppose this extension.

**WHEREFORE**, premises considered, Defendants respectfully request a ten (10) day extension from November 27, 2007, until December 7, 2007, in which to file their Answer to Plaintiff's Amended Complaint.

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<sup>1</sup> Per the ten day extension, Plaintiff's motion was due on November 12, 2007, however, the deadline was moved to November 13, 2007, as November 12, 2007, was Veterans Day, a federal holiday.

Respectfully submitted,

/s/ Abigail H. Avery

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 16<sup>th</sup> day of November, 2007, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

For the Plaintiff:

Russell W. Adams, Esq.  
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/s/ Abigail H. Avery  
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